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December 6, 2023

Via ECF

Hon. Paul G. Gardephe
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *Cargill, Incorporated v. Public Joint Stock Company National Bank Trust,*
Case No. 23-mc-00134-PGG**

Dear Judge Gardephe:

We represent Public Joint Stock Company National Bank Trust (“NBT”) in connection with the above-referenced matter. We write to respectfully inquire into the status of the pending motions (the “Motions”) by Cargill, Incorporated, Louis Dreyfus Company Suisse SA, Louis Dreyfus Company Asia PTE Ltd., Louis Dreyfus Company Trading & Service Co. SA (collectively, the “Movants”) relating to NBT’s application to take discovery pursuant to 28 U.S.C. § 1782 (the “Application”).¹ See ECF Nos. 1, 34.

This Court originally granted NBT’s Application on April 18, 2023. The Movants subsequently lodged various objections to the Application, and those Motions have been fully briefed since July 13, 2023. As set forth in greater detail in NBT’s papers, NBT has satisfied the requirements to take discovery under Section 1782, and the Motions should be denied. To the extent that this Court would find any additional information to be helpful in its resolution of the Motions, NBT is prepared to submit supplemental papers pursuant to the Court’s guidance.

We are grateful for your continued consideration and courtesies in this matter.

Best regards,

/s/ Evan Glassman

Evan Glassman

CC: Counsel of Record

¹ *In re Ex Parte Application, Under 28 U.S.C. § 1782, of Public Joint Stock Company National Bank Trust*, Case No. 23-mc-00006-PGG, ECF No. 11. These cases were consolidated pursuant to the Court’s August 9, 2023 Order.